

STUART I. BLOCK (STATE BAR NO. 160688)
 sblock@coxcastle.com
 PERRY S. HUGHES (STATE BAR NO. 167784)
 phughes@coxcastle.com
 COX, CASTLE & NICHOLSON LLP
 555 California Street, 10th Floor
 San Francisco, CA 94104-1513
 Telephone: (415) 392-4200, Facsimile: (415) 392-4250

Attorneys for Plaintiff
 UNIVERSAL PARAGON CORPORATION and
 SUNQUEST PROPERTIES, INC.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

UNIVERSAL PARAGON CORPORATION, a
 Delaware corporation; and SUNQUEST
 PROPERTIES, INC., a California corporation,

Plaintiffs,

vs.

INGERSOLL-RAND COMPANY LIMITED, a
 Bermuda corporation; INGERSOLL-RAND
 CORPORATION, a New Jersey corporation;
 SCHLAGE LOCK COMPANY, a California
 corporation; and TOUCH-PLATE
 INTERNATIONAL, INC., a California
 corporation,

Defendants.

AND RELATED COUNTERCLAIM

Case No. CV-05-3100 TEH

**STIPULATION TO CONTINUE CASE
 MANAGEMENT CONFERENCE;
~~PROPOSED~~ ORDER**

Date: March 2, 2009
 Time: 1:30 P.M.

Proposed Date: July 13, 2009
 Time: 1:30 P.M.

The parties, Plaintiffs Universal Paragon Corporation and Sunquest Properties, Inc.
 (collectively "Plaintiffs") and Defendant Union Pacific Railroad Company, ("Union Pacific"), hereby
 stipulate, subject to the Court's approval as provided below, to a continuance of the Case Management
 Conference scheduled for March 2, 2009, so that they can continue in good faith to pursue settlement
 discussions. Such discussions include the exchange of information from environmental professionals,

as well as the review of Plaintiffs' proposed Remedial Action Plan ("RAP"), which Plaintiffs contend will help to define the amount in Controversy. Plaintiffs do not expect that the RAP will be approved by the California Department of Toxic Substances Control until the end of April, 2009. Accordingly, the Parties stipulate to, and request that the Court, continue the Case Management Conference to July 13, 2009, at 1:30 p.m., or such other date and time thereafter that is convenient to the Court.

Respectfully submitted,

DATED: February 25, 2009

COX, CASTLE & NICHOLSON LLP

By: 

Perry S. Hughes, Attorney for
Plaintiffs UNIVERSAL PARAGON CORP. and
SUNQUEST PROPERTIES, INC.

DATED: February 25, 2009

BARG COFFIN LEWIS & TRAPP LLP

By:  by 

John F. Barg, Attorney for Counter-Defendant
Union Pacific Railroad Company

IT IS ORDERED that the Case Management Conference scheduled on March 2, 2009, is hereby continued to July 13, 2009 at 1:30 ~~am~~ pm.

Dated: February 26, 2009

Honorable Thelton E. Henderson
United States District Judge

